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Proposed Attorneys for
Official Committee of Equity Holders

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION**

In re:
Ironclad Performance Wear Corporation, a
California corporation,
Debtor and Debtor in Possession.

In re:
Ironclad Performance Wear Corporation, a
Nevada Corporation,
Debtor and Debtor in Possession.

Affects:

- ☒ Both Debtors
☐ Ironclad Performance Wear
Corporation, a California corporation
☐ Ironclad Performance Wear
Corporation, a Nevada corporation.

Case No. 1:17-bk-12408-MB
Jointly administered with:
Case No. 1:17-bk-12409-MB

Chapter 11

**THE OFFICIAL COMMITTEE OF
EQUITY SECURITY HOLDERS'
JOINDER TO DEBTORS' REPLY TO
LIMITED OBJECTION OF JEFFREY
CORDES AND WILLIAM M.
AISENBERG TO THE DEBTORS' SALE
MOTION**

HEARING:

DATE: October 30, 2017
TIME: 10:00 a.m.
PLACE: Courtroom "303"
21041 Burbank Blvd.
Woodland Hills, CA

The Official Committee of Equity Security Holders (the "Equity Committee") hereby joins (the "Joinder") in the *Debtors' Reply To Limited Objection Of Jeffrey Cordes And William M. Aisenberg To The Debtors' Sale Motion* (the "Reply") filed by Ironclad Performance Wear Corporation, a California corporation, and Ironclad Performance Wear Corporation, a Nevada

corporation (collectively, the “Debtors”), the debtors and debtors-in-possession in the above-captioned Chapter 11 bankruptcy cases, and respectfully represents as follows:

I.

JOINDER¹

Jeffrey Cordes and William Aisenberg (the “Objecting Parties”) filed a limited objection (the “Limited Objection”) to the Debtors’ motion (“Motion”) seeking an order of the Court approving the Debtors’ sale of substantially all of their assets. The Debtors dispute any and all claims asserted by the Objecting Parties against the Debtors’ estates, and reserves all of their rights to, object to the Objecting Parties’ claims, and assert claims against the Objecting Parties; so does the Equity Committee.

The Debtors’ Reply requested that the Limited Objection be overruled, based on several grounds, including, but not limited to:

- The Motion does not seek any relief related to the Objecting Parties’ claims, and, therefore, the Limited Objection is not actually responsive to the Motion.
- The Limited Objection was filed after the deadline for the Objecting Parties to file oppositions to the Motion. As such, it was untimely and may be overruled on that basis alone.
- The Objecting Parties request various forms of relief from this Court, none of which should be, or could be, granted to the Objecting Parties for the reasons set forth in the Reply.

The Equity Committee hereby incorporates the foregoing arguments made by the Debtors in the Reply and the additional arguments therein.

II.

CONCLUSION

WHEREFORE, by this Joinder, the Equity Committee hereby requests that the Limited Objection be overruled.

¹ While the Equity Committee attempted to file the Joinder the same day as the Debtors’ Motion (as defined above), the Case Management/Electronic Case Filing system was not available after 1:00 p.m., on October 27, 2017, and will not be available until Monday, October 30, 2017, at 8:30 a.m.

1 Dated: October 27, 2017

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

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4 By: /s/ Tania M. Moyron
Tania M. Moyron

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6 Proposed Attorneys for
the Official Committee of
Equity Holders
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 601 South Figueroa Street, Suite 2500, Los Angeles, CA 90017:

A true and correct copy of the foregoing document entitled (*specify*): **THE OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS' JOINDER TO DEBTORS' REPLY TO LIMITED OBJECTION OF JEFFREY CORDES AND WILLIAM M. AISENBERG TO THE DEBTORS' SALE MOTION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **October 30, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shiva D Beck sbeck@gardere.com, jcharrison@gardere.com
- Ron Bender rb@lnbyb.com
- Cathrine M Castaldi ccastaldi@brownrudnick.com
- Russell Clementson russell.clementson@usdoj.gov
- Aaron S Craig acraig@kslaw.com, lperry@kslaw.com
- Matthew A Gold courts@argopartners.net
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforuptcy.com
- Krikor J Meshefejian kjm@lnbrb.com
- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com
- S Margaux Ross margaux.ross@usdoj.gov
- United States Trustee (SV) ustpregion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) **October 30, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **October 30, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

BY PERSONAL DELIVERY

Hon. Martin R. Barash
US Bankruptcy Court
Central District of California
21041 Burbank Blvd., Suite 342/Ctrm. 303
Woodland Hills, CA 91367

☒ Service information continued on attached page

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 30, 2017 Christina O'Meara
Date Printed Name

/s/Christina O'Meara
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

SERVED BY U.S. MAIL:

<u>Secured Creditor</u> Radian Wareham Holding, Inc. Attn: Mike Tutor, CEO 5305 Distriplex Farms Memphis, TN 38141	<u>Counsel to Radians Wareham Holdings</u> E. Franklin Childress, Jr. Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 165 Madison Ave, Suite 2000 Memphis, Tennessee 38103	U.S. Securities and Exchange Commission Attn: Bankruptcy Counsel 444 South Flower Street, Suite 900 Los Angeles, CA 90071-9591
<u>Governmental Agencies</u>		
Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	Franchise Tax Board Bankruptcy Section, MS: A-340 P.O. Box 2952 Sacramento, CA 95812-2952	State Board of Equalization Account Information Group, MIC: 29 P.O. Box 942879 Sacramento, CA 94279-0029
Employment Development Dept. Bankruptcy Group MIC 92E P.O. Box 826880 Sacramento, CA 94280-0001		
<u>Equity Holders - SERVED BY EMAIL</u>		
Patrick W. O'Brien 301 Whitmore Lane Lake Forest, IL 60045-4707 Email: obrien.pat@me.com	Ronald Chez 1524 N. Astor Street Chicago, IL 60610 Email: rlchez@rcn.com	Scott Jarus 938 Duncan Avenue Manhattan Beach, CA 90266 Email: scott.jarus@verizon.net

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.